

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR LEAVE
TO EXTEND TIME FOR RESPONSE TO DKT. 122**

Plaintiff Virginia Elizondo responds to Defendants' Motion for Leave to Extend Time for Response to Dkt. 122 ("motion") and would respectfully show the Court the following:

1. Defendants' stated reasons for requesting that the Court extend the time in which they are to file "a single member district plan providing for the election of school board trustees" have morphed and changed over the past three days.

2. Before receipt of today's Motion, Defendants' counsel had not invoked their conflicting professional obligations as a basis for relief. Motion, ¶8. Had they done so, as a matter of professional courtesy, Plaintiff's counsel would not have objected to their request. Now that they have done so, Plaintiff withdraws her opposition to Defendants' request.

3. However, the various other excuses Defendants earlier made for refusing to comply with the Court's directive do not warrant the relief requested. *See* the colloquy of counsel in Exhibits 1, 2, 3 and 4, attached.

As a matter of professional courtesy, based on Defendants' counsel's representations about their conflicting trial obligations, Plaintiff does not oppose Defendants' request.

Respectfully submitted,

/s/ Barry Abrams

Barry Abrams

State Bar No. 00822700

SD Tex. Bar No. 2138

Robert Scott

State Bar No. 17911800

SD Tex. Bar No. 3085

Domingo Llagostera

State Bar No. 24070157

SD Tex. Bar No. 1120040

BLANK ROME LLP

717 Texas Avenue, Suite 1400

Houston, Texas 77002

(713) 228-6606

(713) 228-6605 (fax)

barry.abrams@blankrome.com

bob.scott@blankrome.com

domingo.llagostera@blankrome.com

Martin Golando

State Bar No. 24059153

Admitted Pro Hac Vice

THE LAW OFFICE OF MARTIN

GOLANDO, PLLC

2326 W. Magnolia

San Antonio, Texas 78201

(210) 471-1185

(210) 405-6772 (fax)

martin.golando@gmail.com

COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on May 1, 2025, a true and correct copy of Plaintiff's Response to Defendants' Motion for Leave to Extend Time for Response to Dkt. 122 was served on Defendants' counsel via the Court's ECF system.

/s/ Barry Abrams

Barry Abrams